

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

CASE NO.:

SHANTEE REESE,

Plaintiff,

v.

ALORICA INC.,
a Foreign Profit Corporation,

Defendant.

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**DECLARATION OF SUSANNAH LAWLER IN SUPPORT OF
DEFENDANT'S NOTICE OF AND PETITION FOR REMOVAL**

I, SUSANNAH LAWLER, certify under penalty of perjury as follows:

1. My name is SUSANNAH LAWLER and I am over eighteen (18) years of age and competent to testify as to the matters set forth in this Declaration, which are true and accurate based upon my own personal knowledge or information obtained from corporate records.
2. I am currently employed by Alorica Inc. as the Human Resources Director overseeing all employee operations in the United States, including the state of Florida.
3. Alorica Inc. (“Defendant”) is a foreign for-profit corporation.
4. Defendant is incorporated in Delaware and its principal place of business is in California. The California headquarters is the center of management, and nearly all of the company’s general policies and procedures are formulated there. The company’s officers direct, control, and coordinate the company’s activities out of California.
5. Plaintiff Shantee Reese was employed by Alorica Inc. in Florida from about October, 17, 2022 until on or about January 20, 2023. At the time of Plaintiff’s termination, she was earning \$17 an hour, which generally translated to \$680 per week.

6. Pursuant to 29 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on December 11, 2023.



Susannah Lawler
HR Director, Alorica Inc.

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